

THE HONORABLE RICARDO S. MARTINEZ

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

QUNESHIA RAWLS, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

CONVERGENT OUTSOURCING, INC.,

Defendant.

Case No. 2:20-cv-01538-RSM

**JOINT STIPULATION TO EXTEND
DEADLINE FOR DEFENDANT TO
RESPOND TO PLAINTIFF'S
COMPLAINT**

I. STIPULATION

Pursuant to LCR 7, Plaintiff QUNESHIA RAWLS and the opt-in Plaintiffs, by and through their counsel, Frank Freed Subit & Thomas, LLP and Anderson Alexander, PLLC, and Defendant CONVERGENT OUTSOURCING INC., by and through its counsel, Jackson Lewis P.C., hereby stipulate and jointly move this Court for an order extending the deadline for Defendant to file and serve its Response to Plaintiff's Complaint and extending all other case management deadlines accordingly.

The parties have continued in their efforts at exploring an early negotiated resolution; and to that end, Convergent has produced and the parties have analyzed substantial time, pay, and related data for the putative collective/class outlined in the Complaint. The parties have secured a August 11, 2021, mediation date with mediator Michael Russell, where they plan to work in good faith to achieve an early resolution of this

1 **matter**. The parties seek to avoid the time, effort, and costs associated with ongoing litigation
2 pending the results of their efforts to resolve this matter; and according, ask this Court to further
3 extend the above deadlines.

4 Specifically, the parties request that the Court extent the current deadline for Defendant
5 to file and serve its Response to Plaintiff's Complaint from **May 28, 2021**, to **August 25, 2021**
6 (i.e., two weeks after the above referenced mediation) so that the parties can continue their
7 efforts to engage in good faith efforts to explore the resolution of this action.

8 The parties stipulate that good cause exists under LCR 7, Fed. R. Civ. P 16(b)(2), and
9 LCR 16(b) to continue the above-referenced deadlines because the parties have agreed to engage
10 in a near term, good faith exploration of a resolution of this matter that could obviate any further
11 proceedings. The parties likewise stipulate that the requested extension promotes the policy
12 supporting the voluntary resolution of disputes and preservation of judicial resources, and would
13 facilitate an orderly administration of justice.

14 This Stipulation is based upon the following, and the parties agree:

- 15 1. That this request is made in good faith and not for the purpose of delay.
16 2. That nothing in this Stipulation, nor the fact of entering the same, shall be
17 construed as waiving any claim and/or defense held by any party.

18 **IT IS SO STIPULATED.**

19 DATED this 25th day of May 2021.

20 FRANK FREED SUBIT & THOMAS LLP

JACKSON LEWIS P.C.

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II. ORDER

Pursuant to the above stipulation, it is SO ORDERED.

DATED this 26th day of May, 2021.



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE